47 1st Street, Suite 1
Redlands, CA 92373-4601
(909) 915-5900

November 16, 2019

Tom Dodson and Associates
Attn: Tom Dodson
2150 N. Arrowhead Avenue
San Bernardino, California 92504

RE: BIOLOGICAL RESOURCE ASSESSMENT AND JURISDICTIONAL DELINEATION
SHEEP CREEK WATER COMPANY ENHANCED GROUNDWATER SUPPLY WELL DEVELOPMENT PROJECT
COMMUNITY OF PHELAN, CALIFORNIA

Dear Mr. Dodson:

Jericho Systems, Inc. (Jericho) is pleased to provide this letter report that details the results of a general Biological Resources Assessment (BRA) the proposed Sheep Creek Water Company (SCWC) enhanced groundwater supply well development (Project) located in the unincorporated community of Phelan, California.

This report is designed to address potential effects of any development to designated Critical Habitats and/or any species currently listed or formally proposed for listing as endangered or threatened under the federal Endangered Species Act (ESA) and the California Endangered Species Act (CESA), or species designated as sensitive by the California Department of Fish and Wildlife (CDFW), or the California Native Plant Society (CNPS). Attention was focused sensitive species known to occur locally.

This report also addresses resources protected under the Migratory Bird Treaty Act, federal Clean Water Act (CWA) regulated by the U.S. Army Corps of Engineers (USACE) and Regional Water Quality Control Board (RWQCB) respectively; Porter-Cologne Act regulated by the RWQCB and Section 1602 of the California Fish and Game Code (FCG) administered by the CDFW.

SITE LOCATION

The Project site is within three parcels (APNs 306-618-126; 306-622-133; 306-632-126), in San Bernardino County, all within the *Phelan* 7.5-minute USGS Topographic Quadrangle. APN 306-618-126 is located in Township 4 North, Range 7 West, Section 23 and occurs south of Cambria Road and north of Elsinore Road. APN 306-622-133 is located in Township 4 North, Range 7 West, Section 23 and is located at the northwest corner of Sheep Creek Road and Nielson Road. APN 306-632-126 is located in Township 4 North, Range 7 West, Section 24 and is located at the address 4200 Sunnyslope Road, Phelan, CA 92371 north of the terminus of Sahara Road.

ENVIRONMENTAL SETTING

The surrounding local area sits in the Victor Valley which is located in the EPA's Western Mojave Basins ecoregion. The Western Mojave Basins ecoregion is characterized by alluvial plains, fans, and bajadas that are typically dominated by creosote bush and white bursage. Other areas may be dominated by shadscale, four-wing saltbush, or scattered Joshua trees. The Western Mojave Basins typically has less rainfall than the Eastern Mojave Basins, with rainfall increasing southeast toward the Sonoran Desert.

METHODS

As stated above, the objective of this document is to determine whether the Project area supports special status or otherwise sensitive species and/ or their habitat, and to address the potential effects associated with the Proposed project on those resources. The species and habitats addressed in this document are based on database information and field investigation.

Prior to conducting the field study, species and habitat information was gathered from the reports related to the specific project and relevant databases for the *Phelan* USGS quadrangle to determine which species and/or habitats would be expected to occur on site. These sources include:

- U.S. Fish and Wildlife (USFWS) threatened and endangered species occurrence GIS overlay;
- USFWS Information for Planning and Consultation System (IPaC);
- California Natural Diversity Database (CNDDB) *Rarefind 5*;
- CNDDB Biogeographic Information and Observation System (BIOS);
- California Native Plant Society Electronic Inventory (CNPSEI) database;
- Calflora Database;
- USDA Natural Resources Conservation Service (NRCS) Web Soil Survey;
- USFWS National Wetland Inventory;
- Environmental Protection Agency (EPA) Water Program "My Waters" data layers
- USFWS Designated Critical Habitat Maps

Jericho biologist Christian Nordal conducted a general biological resources assessment on October 23, 2019, with an emphasis on special-status species known to occur in the area. Mr. Nordal has advanced degrees and multiple years of experience surveying biological resources within Southern California. Mr. Nordal conducted the systematic and comprehensive survey during calm weather, between the hours of 6 a.m. and 12:00 p.m. Weather conditions during the survey consisted of cloudy skies with temperatures ranging from 46 degrees Fahrenheit (°F) to 75° F and winds at 10 mph.

Wildlife species were detected during field surveys by sight, calls, tracks, scat, or other sign. In addition to species observed, expected wildlife usage of the site was determined per known habitat preferences of regional wildlife species and knowledge of their relative distributions in the area. The focus of the faunal species surveys was to identify potential habitat for special status wildlife within the project area. Disturbance characteristics and all animal sign encountered on the site are recorded in the results section.

Mr. Nordal walked transects spaced approximately 30 feet apart to provide 100 visual coverage of the ground surface of each parcel plus a 300-foot survey buffer, where accessible and feasible. Hand-held, global positioning system (GPS) units were used to survey straight transects, record coordinates of items of interest, to identify project boundaries, and for other pertinent information. Adjacent areas that were not accessible on foot were surveyed with binoculars.

During the site assessment, Mr. Nordal examined natural and non-natural substrates for burrows to determine size, shape, and aspect for suitability for burrowing owl (BUOW) and to see if any BUOW sign (molted feathers, cast pellets, prey remains, and owl whitewash) was present.

The site was also evaluated for the presence of jurisdictional waters, i.e. Clean Water Act (CWA) waters of the U.S.(WoUS) as regulated by the USACE and RWQCB, and California Fish and Game Code (FGC) streambed waters and associated riparian habitat as regulated by the CDFW. Evaluation of potential non-wetland WoUS at the Ordinary High Water Mark (OHWM) in variable, ephemeral, intermittent, or perennial non-wetland waters followed guidance described in *A Field Guide to the Identification of the Ordinary High Water Mark in the Arid West Region of the Western United States* (Lichvar and McColley

2008) and evaluation of potential State jurisdiction followed guidance in the Fish and Game Code and A Review of Stream Processes and Forms in Dryland Watersheds (CDFW, 2010) and *MESA Field Guide, Mapping Episodic Stream Activity* (2011) which look at the "maximum expression" on the landscape, often including the entire floodplain of a river and stream system.

RESULTS

The database searches identified 9 sensitive species (4 plant, 4 animal, 1 invertebrate) within the *Phelan* USGS 7.5-minute series quadrangle (Attachment B: Figure 4). A full summary of these results is outlined in Attachment A. The database searches did not indicate the presence of State- and/or federally-listed threatened or endangered species in the immediate vicinity of the project site.

Site Conditions

APN 306-618-126

APN 306-618-126 is an approximately 0.9-acre parcel that lies north of unimproved Elsinore Road and south of unimproved Cambria Road. The proposed pipeline for this parcel follows an existing access road that is primarily free from vegetation.

Vegetation on site consists of scattered goldenhead (*Acamptopappus sphaerocephalus*), Joshua tree (*Yucca brevifolia*), California juniper (*Juniperus califonica*), California buckwheat (*Eriogonum fasciculatum*), brittlebush (*Encelia farinose*), burro weed (*Ambrosia dumosa*), silver cholla (*Cylindropuntia echinocarpa*), and *schismus*. One Joshua tree (9 feet tall, 8 inch dbh) would potentially be impacted by the pipeline component of the project, whereas seven (7) Joshua trees would be potentially impacted by well development on the parcel (Appendix B); number of trees impacted are subject to change when area of impacts (including staging areas, temporary access, and finalized well dimensions and delineation) have been summarized.

Small mammal burrows were observed on site; wildlife observed included coyote (*Canis latrans*), desert cottontail (*Sylvilagus audubonii*), black-tailed jackrabbit (*Lepus californicus*, white-tailed antelope squirrel (*Ammospermophilus leucurus*), common raven (*Corvus corax*), and house finch (*Haemorhous mexicanus*). The focused surveys were structured in part to detect BUOW. No evidence of BUOW was found on APN 306-618-126. There was no sign of historic or current use of BUOW i.e. no BUOW pellets, feathers or whitewash, no burrows, and no ground squirrels or other fossorial animals to provide surrogate burrows. Additionally, no BUOW have been documented within a 3-mile radius of the subject parcel (Figure 3). Therefore, BUOW are, at the time of this report, considered absent from this parcel.

Soils on site consist of Tujunga sand, cool, 2 to 9 percent slopes.

APN 306-622-133

APN 306-622-133 is an approximately 5.6-acre parcel that lies north of Nielson Road, west of Sheep Creek Road, east of residential development, and south of Phelan Self Storage.

Joshua tree are prominent throughout the site (n>130), and other species observed include goldenhead, California juniper, creosote bush (*Larrea tridentata*), burro weed, chaparral yucca (*Hesperoyucca whipplei*), burrobrush (*Ambrosia salsola*), silver cholla, and Mojave woodyaster (*Xylorhiza tortifolia*). Vegetation is denser in the interior of the parcel and sparser on the north, east, and south (closer to development).

Small mammal burrows were observed on site; wildlife observed include domestic dog (*Canis lupus familiaris*), house finch, common raven, white-crowned sparrow (*Zonotrichia leucophrys*), and black-tailed jackrabbit. No evidence of BUOW was found on APN 306-622-133. There was no sign of historic or current use of BUOW i.e. no BUOW pellets, feathers or whitewash, no burrows, and no ground squirrels or other fossorial animals to provide surrogate burrows. Additionally, no BUOW have been documented within a 3-mile radius of the subject parcel. Therefore, BUOW are, at the time of this report, considered absent from this parcel.

Soils in the very south portion of the parcel consist of Avawatz-oak glen association, gently sloping* and Tujunga sand, cool, 2 to 9 percent slopes for the rest of the parcel. Avawatz series soils are classified as sandy, mixed, mesic Mollic Xerofluvents of granitic origin.

APN 306-632-126

APN 306-632-126 is an approximately 4.2-acre parcel that lies north of Sunnyslope Road and east of Sheep Creek Road. The site is currently in use by the Sheep Creek Water Company, with an office building and water tanks. The northeast quarter of the parcel contains remnant habitat.

Vegetation in the undeveloped portion consists of goldenhead, California juniper, chaparral yucca, California buckwheat, burrobrush, burro weed, and Joshua tree. Nine (9) Joshua trees exist in one cluster on the property. Ornamental cottonwood trees (*Populus fremontii*) border the interior western fence line of the parcel.

Small mammal burrows were observed on site; species observed include desert cottontail and coyote. No evidence of BUOW was found on APN 306-632-126. There was no sign of historic or current use of BUOW i.e. no BUOW pellets, feathers or whitewash, no burrows, and no ground squirrels or other fossorial animals to provide surrogate burrows. Additionally, no BUOW have been documented within a 3-mile radius of the subject parcel. Therefore, BUOW are, at the time of this report, considered absent from this parcel.

Soils on site consist entirely of Avawatz-oak glen association, gently sloping*.

Burrowing owl (BUOW)

The BUOW is a ground dwelling owl typically found in arid prairies, fields, and open areas where vegetation is sparse and low to the ground. The BUOW is heavily dependent upon the presence of mammal burrows, with ground squirrel burrows being a common choice, in its habitat to provide shelter from predators, inclement weather and to provide a nesting place (Coulombe 1971). In California, California ground squirrel (*Spermophilus beecheyi*) burrows are frequently used by BUOW, but they may use dens or holes dug by other fossorial species. They are also known to make use of human-created structures, such as cement culverts and pipes, for burrows. BUOW spend a great deal of time standing on dirt mounds at the entrance to a burrow or perched on a fence post or other low to the ground perch from which they hunt for prey. They feed primarily on insects such as grasshoppers, June beetles and moths, but will also take small rodents, birds, and reptiles. They are active during the day and night but are considered a crepuscular owl; generally observed in the early morning hours or at twilight. The breeding season for BUOW is February 1 through August 31.

The BUOW is not listed under the State or federal ESA but is considered both a State and federal Species of Special Concern (SSC). The BUOW is a migratory bird protected by the international treaty under the Migratory Bird Treaty Act of 1918 and by State law under the California Fish and Game Code (CDFG Code #3513 & #3503.5).

Per the definition provided in the *2012 CDFG Staff Report on Burrowing Owl Mitigation*, "Burrowing owl habitat generally includes, but is not limited to, short or sparse vegetation (at least at some time of year), presence of burrows, burrow surrogates or presence of fossorial mammal dens, well-drained soils, and abundant and available prey." Therefore, all three parcels for the Project contain suitable habitat for this species for the following reasons:

- *Burrows or burrow surrogates are on all three parcels and are appropriate size shape and aspect for BUOW*
- *Vegetation is sparse throughout APN 06618126 and in parts of APN's 306622133 & 306632126*

Nesting Birds and Raptors

The site is suitable for use by raptors for foraging purposes. The project site and immediate surrounding areas do contain habitat suitable for nesting birds in general, including the shrubs on site.

Nesting birds are protected under the MBTA which provides protection for nesting birds that are both residents and migrants whether they are considered sensitive by resource agencies. The MBTA makes it unlawful to take, possess, buy, sell, purchase, or barter any migratory bird listed under 50 CFR 10, including feathers or other parts, nests, eggs, or products, except as allowed by implementing regulations (50 CFR 21). The direct injury or death of a migratory bird, due to construction activities or other construction-related disturbance that causes nest abandonment, nestling abandonment, or forced fledging would be considered take under federal law. The USFWS, in coordination with the CDFW administers the MBTA. CDFW's authoritative nexus to MBTA is provided in FGC Sections 3503.5 which protects all birds of prey and their nests and FGC Section 3800 which protects all non-game birds that occur naturally in the State.

Jurisdiction Waters

There are no drainages on site. No aspect of the site presents any evidence of jurisdictional waters. None of the following indicators are present on site: riparian vegetation, facultative, facultative wet or obligate wet vegetation, harrow marks, sand bars shaped by water, racking, rilling, destruction of vegetation, defined bed and bank, distinct line between vegetation types, clear natural scour line, meander bars, mud cracks, staining, silt deposits, litter- organic debris. No jurisdictional waters occur on site.

CONCLUSIONS AND RECOMMENDATIONS

Burrowing owl

There is potential for BUOW to migrate onto the site in the future. Pre-construction surveys are recommended 30 days prior to construction. If no BUOWs are found at that time, no further action would be required. If, however, BUOW are present, then a BUOW relocation plan would be necessary to passively relocate the owls off site. The relocation plan would also need to be approved by the California Department of Fish and Wildlife prior to implementation.

Nesting Birds

The vegetation on site does have a potential to support nesting birds and foraging raptors such as red-tailed hawks. Bird nesting season generally extends from February 1 through September 15 in southern California and specifically, April 15 through August 31 for migratory passerine birds. To avoid impacts to nesting birds (common and special status) during the nesting season the following is recommended:

A qualified Avian Biologist shall conduct pre-construction Nesting Bird Surveys (NBS) prior to project-related disturbance to nestable vegetation to identify any active nests. If no active nests are found, no further action will be required.

If an active nest is found, the biologist will set appropriate no-work buffers around the nest which will be based upon the nesting species, its sensitivity to disturbance, nesting stage and expected types, intensity and duration of disturbance. The nests and buffer zones shall be field checked weekly by a qualified biological monitor. The approved no-work buffer zone shall be clearly marked in the field, within which no disturbance activity shall commence until the qualified biologist has determined the young birds have successfully fledged and the nest is inactive.

CERTIFICATION

I hereby certify that the statements furnished herein, and in the attached exhibits present data and information required for this analysis to the best of my ability, and the facts, statements, and information presented are true and correct to the best of my knowledge and belief. This report was prepared in accordance with professional requirements and standards. Fieldwork conducted for this assessment was performed by me. I certify that I have not signed a non-disclosure or consultant confidentiality agreement with the project proponent and that I have no financial interest in the project.

Please do not hesitate to contact me at 909-915-5900 should you have any questions or require further information.

Sincerely,

Shay Lawrey,
Ecologist/Regulatory Specialist

Attachments:

Attachment A – Table of Documented Occurrences
Attachment B – Figures
Attachment C – Site Photos

Attachment A
Table of Database Queries (CNDDB, IPAC, CNPSEI)

Scientific Name	Common Name	Federal Status State Status Other Statuses	Habitats	Potential To Occur
Plants				
Canbya candida	white pygmy-poppy	None None G3G4 S3S4 4.2 USFS: Sensitive	Joshua tree woodland, Mojavean desert scrub, pinyon and juniper woodland. Gravelly, sandy, granitic places. 600-1460 m.	Joshua tree woodland/Mojavean desert scrub exists on the Project site with sandy soils in the known elevation range. Species has a moderate potential to occur on all three parcels. Species was not observed during survey.
Castilleja plagiotoma	Mojave paintbrush	None None G4 S4 4.3	Great Basin scrub (alluvial), Joshua tree woodland, Lower montane coniferous forest, Pinyon and juniper woodland 300-2500 m	Joshua tree and juniper are present on all three parcels within known elevation range. Species has a moderate potential to occur on all three parcels. Species was not observed during survey.
Opuntia basilaris var. *brachyclada*	short-joint beavertail	None None G5T3 S3 1B.2 BLM: Sensitive USFS: Sensitive	Chaparral, Joshua tree woodland, Mojavean desert scrub, pinyon-juniper woodland. Sandy soil or coarse, granitic loam. 425-1800 m.	Joshua tree woodland/Mojavean desert scrub exists on the Project site with sandy soils in the known elevation range. Species has a moderate potential to occur on all three parcels. Species was not observed during survey.
Quercus turbinella	shrub live oak	None None G5 S4 4.3	Chaparral, Cismontane woodland, Lower montane coniferous forest, Pinyon and juniper woodland 1200-2000 m	While juniper is present on all three parcels, it is not the dominant species and site elevations occur at the lower range of where this species is found. Potential to occur is low.
Birds				
Gymnogyps californianus	California condor	Endangered Endangered G1 S1 CDF: Sensitive CDFW: Fully Protected IUCN: Critically Endangered	Require vast expanses of open savannah, grasslands, and foothill chaparral in mountain ranges of moderate altitude. Deep canyons containing clefts in the rocky walls provide nesting sites. Forages up to 100 miles from roost/nest.	The site occurs outside of the current range of this species. Potential to occur is low.

		NABCI: Red Watch List		
Toxostoma lecontei	Le Conte's thrasher	None None G4 S3 CDFW: Species of Special Concern IUCN: Least Concern NABCI: Red Watch List USFWS: Birds of Conservation Concern	Desert resident; primarily of open desert wash, desert scrub, alkali desert scrub, and desert succulent scrub habitats. Commonly nests in a dense, spiny shrub or densely branched cactus in desert wash habitat, usually 2-8 feet above ground.	Desert succulent scrub occurs on all three parcels. Species has a moderate potential to occur on all three parcels. Species was not observed during survey.
Reptiles				
Gopherus agassizii	desert tortoise	Threatened Threatened G3 S2S3 IUCN: Vulnerable	Most common in desert scrub, desert wash, and Joshua tree habitats; occurs in almost every desert habitat. Require friable soil for burrow and nest construction. Creosote bush habitat with large annual wildflower blooms preferred.	Desert scrub/Joshua tree occurs on all three parcels. No desert tortoise have been documented within a 3-mile radius of the site. Species has a low potential to occur on all three parcels. Species or evidence of this species was not observed during survey.
Phrynosoma blainvillii	coast horned lizard	None None G3G4 S3S4 BLM: Sensitive CDFW: Species of Special Concern IUCN: Least Concern	Frequents a wide variety of habitats, most common in lowlands along sandy washes with scattered low bushes. Open areas for sunning, bushes for cover, patches of loose soil for burial, and abundant supply of ants and other insects.	Species is a habitat generalist. Open areas occur on all three parcels. Species has potential to occur on all three parcels.
Insects				
Bombus crotchii	Crotch bumble bee	None Candidate Endangered G3G4 S1S2	Coastal California east to the Sierra-Cascade crest and south into Mexico. Food plant genera include *Antirrhinum, Phacelia, Clarkia, Dendromecon, Eschscholzia*, and *Eriogonum*.	Food plant general occur on all three parcels. Species has potential to occur on all three parcels.

Tom Dodson
BRA/JD – SCWC Enhanced Groundwater Supply Well Development
November 16, 2019

Coding and Terms

E = Endangered T = Threatened C = Candidate SSC = Species of Special Concern R = Rare

State Species of Special Concern: An administrative designation given to vertebrate species that appear to be vulnerable to extinction because of declining populations, limited acreages, and/or continuing threats. Raptor and owls are protected under section 3502.5 of the California Fish and Game code.

Global Rankings (Species or Natural Community Level):

G1 = Critically Imperiled – At very high risk of extinction due to extreme rarity (often 5 or fewer populations), very steep declines, or other factors.
G2 = Imperiled – At high risk of extinction due to very restricted range, very few populations (often 20 or fewer), steep declines, or other factors.
G3 = Vulnerable – At moderate risk of extinction due to a restricted range, relatively few populations (often 80 or fewer), recent and widespread declines, or other factors.
G4 = Apparently Secure – Uncommon but not rare; some cause for long-term concern due to declines or other factors.
G5 = Secure – Common; widespread and abundant.

Subspecies Level: Taxa which are subspecies or varieties receive a taxon rank (T-rank**)** attached to their G-rank. Where the G-rank reflects the condition of the entire species, the T-rank reflects the global situation of just the subspecies. For example: the Point Reyes mountain beaver, *Aplodontia rufa* ssp. *phaea* is ranked G5T2. The G-rank refers to the whole species range i.e., *Aplodontia rufa.* The T-rank refers only to the global condition of ssp. *phaea*.

State Ranking:

S1 = Critically Imperiled – Critically imperiled in the State because of extreme rarity (often 5 or fewer populations) or because of factor(s) such as very steep declines making it especially vulnerable to extirpation from the State.
S2 = Imperiled – Imperiled in the State because of rarity due to very restricted range, very few populations (often 20 or fewer), steep declines, or other factors making it very vulnerable to extirpation from the State.
S3 = Vulnerable – Vulnerable in the State due to a restricted range, relatively few populations (often 80 or fewer), recent and widespread declines, or other factors making it vulnerable to extirpation from the State.
S4 = Apparently Secure – Uncommon but not rare in the State; some cause for long-term concern due to declines or other factors.
S5 = Secure – Common, widespread, and abundant in the State.

California Rare Plant Rankings (CNPS List):

1A = Plants presumed extirpated in California and either rare or extinct elsewhere.
1B = Plants rare, threatened, or endangered in California and elsewhere.
2A = Plants presumed extirpated in California, but common elsewhere.
2B = Plants rare, threatened, or endangered in California, but more common elsewhere.
3 = Plants about which more information is needed; a review list.
4 = Plants of limited distribution; a watch list.

Threat Ranks:

.1 = Seriously threatened in California (over 80% of occurrences threatened / high degree and immediacy of threat)
.2 = Moderately threatened in California (20-80% occurrences threatened / moderate degree and immediacy of threat)
.3 = Not very threatened in California (less than 20% of occurrences threatened / low degree and immediacy of threat or no current threats known)

Attachment B
Table of Joshua Tree Measurements on Parcels With Less Than Fifty Individuals

Abbreviation Code	Height	Diameter
APN 306-618-126		
JT1	18 feet	2 feet
JT1	18 feet	2 feet
JT1	18 feet	2 feet
JT1	10 feet	1 foot
JT1	10 feet	1 foot
JT1	10 feet	1 foot
JT1	10 feet	1 foot
JT1	10 feet	1 foot
JT1	10 feet	1 foot
APN 306-632-126		
YB1	7 feet	7 inches
YB2	2 feet	6 inches
YB3	5 feet	6 inches
YB4 (3 trunks)	4 feet	6 inches
YB5	5 feet	6 inches
YB6	3 feet	6 inches
YB7	2 feet	4 inches

ATTACHMENT B
FIGURES

ATTACHMENT C
SITE PHOTOS

APN 306-618-126

	Photo 1. North-facing view of the front of the parcel showing the existing office building and parking lot.
	Photo 2. North-facing view of the parcel showing rubble and remnant scrub.

	Photo 3. East-facing view from the center of the parcel, showing remnant scrub in the northeast portion of the parcel.
	Photo 4. West-facing view from the center of the parcel showing existing water tank facilities.

	Photo 5. Remnant scrub in the northeast corner of the portion.
	Photo 6. Single stand of Joshua tree in the northeast corner of the parcel.

	Photo 7. Scrap material in the northern portion of the parcel.
	Photo 8. Southwest view from the scrub on site facing the existing office building and water tanks.

APN 306-632-126

	Photo 1. Northwest-facing view from the parcel; existing development on Beekley Road is visible.
	Photo 2. South-facing view from the parcel; existing development on Elsinore Road is visible.

	Photo 3. Southeast-facing view from the center of the parcel.
	Photo 4. North-facing view from the access road where the pipeline is to be built. The Joshua tree to be potentially impacted can be seen on the right.

	Photo 5. Joshua tree to be potentially impacted from the construction of the pipeline.

APN 306-622-133

	Photo 1. East-facing photo of Nielson Road from the parcel's southwest corner.
	Photo 2. West-facing photo of development that is adjacent to the southwestern portion of the parcel.

	Photo 3. East-facing photo of Joshua trees and scrub on site; Nielson Road and powerlines are visible in the right portion of the photo.
	Photo 4. East-facing photo showing thicker stands of Joshua tree and Juniper in the center of the parcel.

	Photo 5. North-facing photo of the wall that separates the parcel from Phelan Self Storage.
	Photo 6. South-facing photo of the desert scrub and Joshua tree woodland on the parcel.